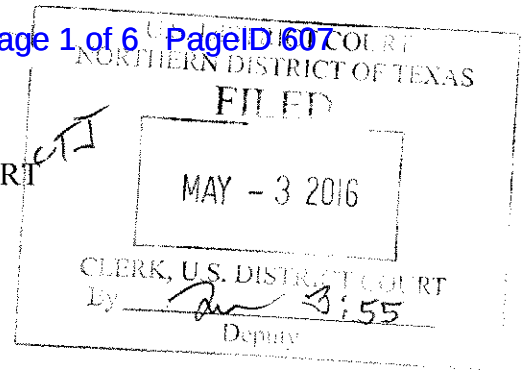


ORIGINAL

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



ERIC C. DARDEN, as Administrator of the §
Estate of Jermaine Darden, §
Plaintiff, §

v. §

THE CITY OF FORT WORTH, TEXAS, et al., §
Defendants. §

CIVIL ACTION NO. 4:15-CV-221-A

DEFENDANT W.F. SNOW and J. ROMERO'S DESIGNATION OF EXPERTS

TO THE HONORABLE JUDGE OF SAID COURT:

Pursuant to the Court's Order Setting Schedule and Providing Special Pretrial Instructions (Doc. No. 56), as amended (Doc. No. 59) and Fed. R. Civ. P. 26(a)(2), Defendants W.F. Snow and J. Romero file this their Designation of Experts, and would respectfully show unto the Court as follows:

I.

Witnesses required to provide a written report. Fed. R. Civ. P. 26(a)(2)(B)

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II.

Witnesses not required to provide a written report. Fed. R. Civ. P. 26(a)(2)(C)

Without waiving the right to challenge any other parties' attempt to elicit testimony from any non-retained expert witness that exceeds the scope and intent of Fed. R. Civ. P. 26(a)(2), Defendant may call the following persons (for purposes consistent with the scope and intent of Fed. R. Civ. P. 26(a)(2)), who are not retained or specially employed to provide expert testimony in this case and who are not regularly employed by the defendant to provide expert testimony, to present evidence under Rules 702, 703, or 705 of the Federal Rules of Evidence. Defendant also reserves the right to challenge the testimony of any person listed below should another party attempt to offer testimony from the person that is unreliable or for which the person is unqualified to opine.

1. Defendant Officer W.F. Snow by and through his undersigned attorney, Kenneth E. East, 9001 Airport Freeway, Suite 675, North Richland Hills, Texas 76180, 817-788-1111.

2. Defendant Officer J. Romero, by and through his attorney of record, D. Lee Thomas, Jr., 507 W. Central Avenue, Fort Worth, Texas 76164, 817-625-8866.

¹ Dr. Greenberg is a fact witness, a non-retained expert, and a retained expert.

3. All police officers who witnessed all or part of the incident, were involved in any way in any work done in preparation for the service of the warrant at issue herein, were involved in any investigation or review of the incident, or otherwise have knowledge relevant to this lawsuit. Such individuals can be reached through Laetitia Coleman Brown, Attorney for Defendant City of Fort Worth, Laetitia Coleman Brown, Fort Worth City Attorney's Office, 1000 Throckmorton St., Fort Worth, Texas 76102, 817-392-6639. Otherwise, their work address generally is Fort Worth Police Department, 350 West Belknap Street Fort Worth, TX 76102, (817) 392-4000. Such other police officers include, but are not limited to the following:

DANFORD,NB #2506	drafted search warrant and related documents, wrote incident report
C.M. Gilmore #3008	acted as evidence custodian
CPL J Sutherland 343 OFC C Brady 2687 OFC E Chavez 3520 OFC C Gray 3855 OFC W Snow 3450 OFC J Ricks 3484 OFC S Tabor 3662 OFC J Romero 3648	members of Central ZT team, which served subject warrant
Officer GD Sprout 3290	confirmed warrants of arrestees
Sgt RE Johnson 2478 AD Taylor #3604 J Sandoval 3625 CM Jones 3767 CM Gilmore 3008 JE Bell 3816 NB Danford	narcotics officers who searched scene
Detective D.G. Rohloff #2522 D.L. BAGGOTT, ID 2186 Det. Murtaugh	worked on CPI investigation of subject incident

Officer M. Kaether, ID #3893 Officer A. Brewer, ID #3979	present at scene and were at hospital with Jermaine Darden after incident
Officer Campbell	at hospital with Jermaine Darden after incident
Officer Jeannes	CSSU officers who collected evidence after incident
Lt. Verrett	may have responded to scene

4. Officer Jamie Johnson. Officer Johnson can be reached through Laetitia Coleman Brown, Attorney for Defendant City of Fort Worth, Laetitia Coleman Brown, Fort Worth City Attorney's Office, 1000 Throckmorton St., Fort Worth, Texas 76102, 817-392-6639. Otherwise, his work address generally is Fort Worth Police Department, 350 West Belknap Street Fort Worth, Texas 76102, (817) 392-4000.

5. Tarrant County Medical Examiner, personnel and custodians of records, including:

Lloyd White, M.D., Ph.D., former Deputy Medical Examiner (current contact information unknown to Defendants)

Tasha Z. Greenberg, M.D., Deputy Medical Examiner

Nizam Peerwani, M.D., DABFP, Chief Medical Examiner

Robert Johnson, PH.D., DABFT, Chief Toxicologist

Kyle Finney, Medical Investigator

Michael Floyd, Chief Forensic Death Investigator

Office of Chief Medical Examiner

Tarrant County Medical Examiner's District

Tarrant County, Texas

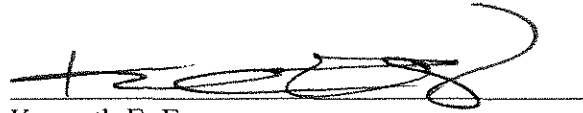
200 Feliks Gwozdz Place, Fort Worth, Texas 76104-4919

(817) 920-5700 FAX (817) 920-5713

6. All of Plaintiff's past or present medical providers and custodians of records thereof. Defendants do not have access to these witnesses and do not know their opinions beyond what is in

their respective records, if any. Defendants may call any of these providers in rebuttal to Plaintiff's and his experts' claims.

Respectfully submitted,



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ATTORNEY FOR DEFENDANT
J. ROMERO

CERTIFICATE OF SERVICE

I hereby certify that on May 3, 2016, I served a copy of this document on the following parties or their counsel of record:

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